

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CYRANO, INC.,

Plaintiff,

v.

QUOTIUM TECHNOLOGIES, INC.,

QUOTIUM TECHNOLOGIES, S.A.,

and

TECHNOLOGIES, S.A.,

Defendants.

CIVIL ACTION NO. 05-CV-11558-DPW

**DEFENDANTS' ASSENTED-TO MOTION FOR LEAVE
TO FILE REPLY MEMORANDUM**

Pursuant to Local Rule 7.1(b)(3), Defendants Quotium Technologies, Inc., Quotium Technologies, S.A., and Technologies, S.A. (collectively, "Quotium") move for leave to file a reply memorandum in further support of their motion to dismiss or stay the present action commenced by Plaintiff Cyrano, Inc. ("CI").

As reasons for granting this motion, Quotium state as follows:

- i. Quotium has filed a motion to dismiss or stay the present action;
- ii. As a basis for this relief, the motion refers to numerous rulings, filings, and events in a related case, C.A. 02-11416, presently pending before Judge Tauro, which involves the same parties;
- iii. The related case has a complicated history, which it is important for the Court to understand in order to evaluate Quotium's motion;
- iv. CI has filed an opposition which contains numerous materially misleading statements and omissions concerning the related action, as well as concerning its claims in this action;
- v. The Court would be greatly assisted by the reply memorandum because in it Quotium further clarifies the background of the related action and its legal bearing on the present action.

WHEREFORE, Quotium respectfully moves the Court to grant it leave to file a reply memorandum.

Respectfully submitted,

QUOTIUM TECHNOLOGIES, INC.,
TECHNOLOGIES, S.A., and
QUOTIUM TECHNOLOGIES, S.A.,
By their attorneys,

/s/ Kevin J. O'Connor

Kevin J. O'Connor (BBO# 555250)

Mayeti Gametchu (BBO# 647787)

John Pagliaro (BBO# 634483)

PARAGON LAW GROUP, LLP

184 High Street

Boston, MA 02110

Tel. (617) 399-7950

DATED: October 27, 2005

Local Rule 7.1 Certificate of Conferral

I certify that on October 27, 2005 I conferred with Michael Sugrue, Esq., counsel of record for the plaintiff in an attempt to narrow the issues and that Attorney Sugrue indicated his client's assent to this motion.

/s/ Kevin J. O'Connor

Kevin J. O'Connor

Certificate of Service

I certify that on October 27, 2005, I served a copy of the foregoing reply by first class mail, post paid, on Michael Sugrue, counsel of record for the Plaintiff Cyrano, Inc.

/s/ John R. Pagliaro

John R. Pagliaro